

**UNITED STATES DISTRICT COURT
OF PUERTO RICO
CASE NO. 22-CR-00342-SCC**

UNITED STATES OF AMERICA,
Plaintiff,

v.

MARK T. ROSSINI,
Defendant.

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UNOPPOSED MOTION TO TRAVEL

Mark Rossini (“Mr. Rossini”), through undersigned counsels, respectfully requests that Your Honor allow him to travel to London, England from November 25th, 2023 to November 30, 2023 to meet with his attorneys.

1. On October 25, 2023, Your Honor granted Mr. Rossini’s request to reside in Madrid, Spain, from November 28, 2023 through the first week of March 2024, with permission to travel to France and Switzerland, to undergo cancer treatment and tend to other matters. (DE 365).
2. With the Court’s permission, Mr. Rossini has traveled five times without incident.¹
3. Counsels Michael B. Nadler and Juan J. Michelen will be in London, England the week of November 27, 2023, on another matter, and would

¹ To Spain, from September 23, 2022 to October 19, 2022, to receive cancer treatments; (DE 98); To Spain, from December 20, 2022 to January 25, 2023, also for medical treatment. (DE 141); To Spain, from February 27, 2023 to March 13, 2023, for cancer treatment. (DE 166); To Spain, from April 4, 2023 to May 13, 2023, for cancer treatment. (DE 182); and To Spain, from September 14, 2023 to October 10, 2023, for cancer treatment (DE 259).

like to take the opportunity to meet with Mr. Rossini while there.

4. Once Mr. Rossini meets with undersigned counsels he would travel to Madrid, Spain in accordance with Your Honor's prior Order. (DE 365).
5. Details regarding Mr. Rossini's travel itinerary and contact information will be provided to Mr. Rossini's assigned probation officer, and to the Court under seal upon request.
6. Assistant U.S. Attorneys Nicholas Cannon and Ryan Crosswell do not object to this request.

WHEREFORE, Mr. Rossini respectfully requests that Your Honor allow him to travel to London, England from November 25th, 2023 to November 30, 2023 to meet with his attorneys.

Respectfully submitted,

/s/ Lydia Lizarribar Masini

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Attorneys for Mark T. Rossini

CERTIFICATE OF SERVICE

I certify that on November 13, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

/s/ Juan J. Michelen

Juan J. Michelen